

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HARDEN MANUFACTURING)
CORPORATION, individually and on)
behalf of itself and others similarly situated,)

Plaintiff,)

v.)

PFIZER INC. and PARKE-DAVIS,)
a division of Warner-Lambert Company,)

Defendants.)

Civil Action No. 04–10981-PBS

**JOINT MOTION FOR ENLARGEMENT OF TIME TO
FILE PROPOSED PROTECTIVE ORDER**

The parties to the above matter and all related matters (MDL 1629), by the undersigned liaison counsel and counsel, respectfully move for an enlargement from December 15, 2004, to December 21, 2004, of the time within which they must submit a Proposed Protective Order.

The grounds for this motion are:

1. At the November 23, 2004 initial conference, the Court instructed the parties to submit a Proposed Protective Order on or before December 15, 2004.
2. A draft of the Proposed Protective Order is in circulation, and there have been discussions concerning the draft.

3. Although progress toward an agreement on the proposed order has been made, it has been slow because so many parties are involved. Differences with respect to some provisions still exist.

4. The parties have not been able either to reach an agreement on the Proposed Protective Order or to exhaust their efforts toward an agreement.

5. If given the additional time requested, the parties may be able to reach an agreement, which would be of obvious benefit to the parties and the Court.

WHEREFORE, the parties respectfully request that the Court enlarge to December 21, 2004, the period within which they must submit a Proposed Protective Order.

Dated: December 15, 2004

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